

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

LORI FITZGERALD, *et al.*,

Plaintiffs,

v.

JOSEPH WILDCAT SR., *in his official and individual  
capacities, et al.*,

Defendants.

Case No. 3:20-cv-00044-NKM-JCH

**PLAINTIFFS' MOTION TO SEAL**

Plaintiffs, by counsel, pursuant to Local Rule 9, request the Court to permit portions of the Second Amended Complaint and Exhibit 3 thereto to be filed under seal. In support thereof, Plaintiffs state as follows:

1. On December 22, 2022, the Court granted the Defendants' Motion to Seal, which sought to seal a contract between Ningodwaaswi, LLC d/b/a Sky Trail Cash and Skytrail Servicing Group, LLC. Dkt. 128.

2. Thereafter, Plaintiffs sought leave to amend their complaint to add information related to the contract. Defendants consented to this motion so long as the Second Amended Complaint was properly redacted, and the Court ordered: "If the SAC contains any information that the Court has previously ordered to be filed under seal, see, e.g., Order, ECF No. 128, Plaintiffs shall redact that information from the publicly filed SAV and file the unredacted SAC under seal." Dkt. 134.

3. In accordance with the Court's Orders, Plaintiffs requests the Court to permit portions of the Second Amended Complaint and Exhibit 3 thereto to be filed under seal.

Respectfully submitted,  
**PLAINTIFFS**

By: /s/ Kristi C. Kelly  
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